

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**ROBERT J. MUELLER, DEEPROOT FUNDS
LLC (a/k/a dprt Funds, LLC), AND POLICY
SERVICES INC.,**

Defendants,

-and-

**DEEPROOT TECH LLC, DEEPROOT
PINBALL LLC, DEEPROOT STUDIOS LLC,
DEEPROOT SPORTS & ENTERTAINMENT
LLC, DEEPROOT RE 12621 SILICON DR LLC,
AND ROBERT J. MUELLER, JEFFREY L.
MUELLER, AND BELINDA G. BREEN, AS CO-
TRUSTEES OF THE MB HALE OHANA
REVOCABLE TRUST,**

Relief Defendants.

Civil Action No.: 5:21-cv-785-XR

**DEFENDANT ROBERT J. MUELLER'S OBJECTIONS TO PLAINTIFF'S
DESIGNATION OF POTENTIAL EXHIBITS**

TO THE HONORABLE COURT:

Pursuant to Fed. R. Civ. P. 26(a)(3) and the Court's Sixth Amended Scheduling Order (ECF No. 140), Defendant Robert J. Mueller submits the following objections to Plaintiff Security and Exchange Commission's (the "**SEC**") Designation of Potential Exhibits. To the extent these objections have already been ruled on in prior proceedings, they are being made solely for the purposes of preservation.

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|----------------|---|------------------------------|------------|-----------|---|
| P-1 | 575 Fund PPM Sept. 1, 2015 | SEC-DEEPROOT-E-0014497 - 12 | X | | None. |
| P-2 | 575 Fund PPM Sept. 1, 2015 | SEC-DEEPROOT-E-0164808 - 23 | X | | None. |
| P-3 | 575 Fund PPM Sept. 16, 2019 | SEC-DEEPROOT-E-0164824 - 41 | X | | None. |
| P-4 | 575 Fund PPM Jan. 1, 2021 | SEC-DEEPROOT-E-0211514 - 30 | X | | None. |
| P-5 | dGRD Fund PPM Aug. 3, 2015 | SEC-DEEPROOT-E-0013399 - 416 | X | | None. |
| P-6 | dGRD Fund PPM Aug. 3, 2015 | SEC-DEEPROOT-E-0164786 - 803 | X | | None. |
| P-7 | dGRD Fund PPM Sept. 12, 2019 | SEC-DEEPROOT-E-0164762 - 780 | X | | None. |
| P-8 | Operating Agreement of 575 Fund, Sept. 1, 2015 | MUELLER 001067 - 88 | X | | None. |
| P-9 | Operating Agreement of 575 Fund, Feb. 26, 2018 | DEEPROOT-E-0019790 | X | | None. |
| P-10 | Operating Agreement of dGRD Fund, Aug. 3, 2015 | MUELLER 001045-66 | X | | None. |
| P-11 | Operating Agreement of dGRD Fund, Feb. 26, 2018 | SEC-DEEPROOT-E-0005760 | X | | None. |
| P-12 | Gray Application and Subscription to 575 Fund | DEEPROOT FUNDS_002274 - 80 | X | | None. |
| P-13 | Withdrawn | | | | |
| P-14 | Withdrawn | | | | |
| P-15 | Withdrawn | | | | |
| P-16 | deeproot Organizational Charts | DEEPROOT FUNDS_006214 - 6 | X | | None. |
| P-17 | Investment Allocation Agreement | SEC-DEEPROOT-E-0213963 - 66 | X | | None. |
| P-18 | Contingent Pledge and Security Agreement | SEC-DEEPROOT-E-0213967 - 79 | | X | None. |
| P-19 | Expert Report of Bill Post Mar. 17, 2023 | | X | | Hearsay; improper legal opinions that invade the province of the Court; Rule 403; Rule 702. |
| P-20 | Supplemental Expert Report of Bill Post Apr. 27, 2023 | | X | | Hearsay; improper legal opinions that invade the province of the Court; |

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| | | | | | Rule 403; Rule 702. |
| P-21 | Order Authorizing and Approving the Sale of Certain Personal Property Free and Clear of All Interests Pursuant to 11 U.S.C. §§ 363(b) and (f), in the matter of <i>In re deeproot Capital Management, LLC</i> (Bkr. No. 21- 51523-MMP), <i>et al.</i> , and <i>In re Policy Services, Inc.</i> (Bkr. No. 21-51513-MMP), in the United States Bankruptcy Court for the Western District of Texas. | | | X | Rule 403. |
| P-22 | Summary: List of Bank Accounts and Credit Cards | | X | | Rule 403 – Incomplete. |
| P-23 | Summary: Allowable Spend Compared to Actual Spend | | X | | Rule 403; Assumes facts not in evidence; lack of foundation. |
| P-24 | Summary: Fractionalized Shares of Policies Sold to Outside Investors | | X | | Rule 403; Assumes facts not in evidence; lack of foundation; also includes hearsay. |
| P-25 | Summary: Maturity Distribution for Policies with Fracationalized Shares Sold to Prior Investors | | X | | Rule 403; Assumes facts not in evidence; lack of foundation; also includes hearsay. |
| P-26 | Withdrawn | | | | |
| P-27 | Withdrawn | | | | |
| P-28 | Complaint, Dkt. 001 | | | X | Hearsay. |
| P-29 | Answer, Dkt. 043 | | | X | Hearsay. |
| P-30 | Mueller Responses and Objections to SEC's First Set of Interrogatories Aug. 19, 2022 | | | X | Mueller objects to the extent that the SEC relies on any answers that included objections as the SEC has not received rulings resolving such objections. |

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| P-31 | Mueller Responses and Objections to SEC's First and Second Set of Requests for Admissions Dec. 12, 2022 | | | X | Mueller objects to the extent that the SEC relies on any answers that included objections as the SEC has not received rulings resolving such objections. |
| P-32 | Mueller Sworn Accounting | SEC-RJM-E-0000015 - 727 | X | | None. |
| P-33 | Hulings letter to SEC Apr. 6, 2023 | | | X | None. |
| P-34 | deeproot Pinball Disclosure | DEEPROOT FUNDS 005379 - 83 | X | | None |
| P-35 | deeproot Funds Commercial Real Estate Allocation Disclosure | DEEPROOT FUNDS_005384 - 90 | X | | None. |
| P-36 | deeproot Sports & Entertainment Disclosure | DEEPROOT FUNDS 005391 - 99 | X | | None. |
| P-37 | Portfolio Overview | DEEPROOT FUNDS 005609 - 12 | X | | Rule 403. |
| P-38 | Assets Backing Up Investments Apr. 1, 2019 | DEEPROOT FUNDS 005625 | X | | Rule 403. |
| P-39 | As simple as 123 | DEEPROOT FUNDS 005627 | X | | None. |
| P-40 | deeproot Conference Materials - 2 Feb. 20, 2020 | DEEPROOT FUNDS 005636 - 37 | X | | None. |
| P-41 | The deeproot Story | DEEPROOT FUNDS 005639 - 40 | X | | None. |
| P-42 | 2017 Training Webinar | DEEPROOT FUNDS 005641 - 53 | | X | None. |
| P-43 | Withdrawn | | | | |
| P-44 | deeproot Miscellaneous Presentations | DEEPROOT FUNDS 005660 - 707 | X | | None. |
| P-45 | deeproot Kauai January 2020 Conference Deck Feb. 20, 2020 | DEEPROOT FUNDS 005677 - 83 | | X | None. |
| P-46 | deeproot Strengths & Track Record | DEEPROOT FUNDS 005708 | | X | None. |
| P-47 | Summer 2017 Updates | DEEPROOT FUNDS 005709 - 12 | | X | None. |
| P-48 | deeproot Presentation Rev. 2020-CB- 3A | DEEPROOT FUNDS 005713 - 39 | | X | None. |

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| P-49 | Mueller email to Concilla and Federico re deeproot GROWTH RUNS DEEP FUND, LLC Jan. 8, 2015 | MUELLER 001441 - 1553 | | X | None. |
| P-50 | Texas Certificate of Filing dGRD Fund Jan. 8, 2015 | MUELLER 001530 | | X | None |
| P-51 | Mueller email to Concilla and Federico re deeproot 575 FUND, LLC Jan. 8, 2015 | MUELLER 001554 - 1664 | | X | None. |
| P-52 | Texas Certificate of Filing 575 Fund LLC Jan. 8, 2015 | MUELLER 001665 | | X | None. |
| P-53 | Management Discussion and Analysis of Financial Condition Feb. 10, 2015 | MUELLER 001774 - 84 | | X | Rule 403. |
| P-54 | Mueller email to Federico and Concilla re Pinball Update May 12, 2015 | MUELLER 002186 -99 | | X | None. |
| P-55 | Withdrawn | | | | |
| P-56 | Withdrawn | | | | |
| P-57 | Mueller email to Concilla re deeproot dGRD fund Aug. 5, 2015 | MUELLER 002404 | | X | None. |
| P-58 | dGRD Fund PPM with tracked changes Aug. 10, 2015 | MUELLER 002472 - 90 | | X | None. |
| P-59 | Withdrawn | | | | |
| P-60 | Concilla email to Mueller re dGRD - PPM Aug. 12, 2015 | MUELLER 002649 - 67 | X | | None. |
| P-61 | Mueller email to Concilla re dGRD Aug. 12, 2015 | MUELLER 002688 | X | | None. |
| P-62 | Mueller email to Concilla re dGRD Aug. 18, 2018 | MUELLER 002705 - 06 | X | | None. |
| P-63 | Concilla email to Mueller re deeproot Funds Aug. 21, 2019 | MUELLER 002715 - 17 | X | | None. |
| P-64 | Concilla email to Mueller re deeproot Sept. 1, 2015 | MUELLER 002813 - 14 | X | | None. |
| P-65 | Mueller email to Concilla re Investor Presentation Sept. 24, 2015 | MUELLER 002815 - 51 | X | | None. |
| P-66 | Withdrawn | | | | |

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| P-67 | Concilla email to Mueller re Investor Presentation Sept. 24, 2015 | MUELLER 002853 | X | | None. |
| P-68 | Withdrawn | | | | |
| P-69 | Withdrawn | | | | |
| P-70 | Mueller email to Andrew and Regan re Oct, Nov, Dec Oct. 25, 2017 | CYCL003627 - 28 | X | | None. |
| P-71 | Withdrawn | | | | |
| P-72 | Andrew email to Mueller re Follow- up Apr. 1, 2018 | CYCL006055 - 56 | X | | None. |
| P-73 | Mueller email to Andrew re deeproot Apr. 5, 2019 | CYCL006121 - 22 | X | | None. |
| P-74 | Regan email to Andrew re Basha Contracts Oct. 9, 2019 | CYCL006202 - 46 | | X | Hearsay. |
| P-75 | Shelly email to Andrew, Regan re Bash Policy Relinquishment Payment Oct. 15, 2019 | CYCL006249 - 50 | | X | Hearsay. |
| P-76 | Withdrawn | | | | |
| P-77 | 575 Trifold Brochure | JR000140 | | X | None. |
| P-78 | Spradlin email to Richardson re deeproot Sept. 5, 2018 | JR000249 - 78 | | X | Rule 403; Hearsay. |
| P-79 | Richardson email to Spradlin re deeproot Sept. 26, 2018 | JR000344 - 47 | | X | Rule 403; Hearsay. |
| P-80 | Spradlin email to Thompson re deeproot Sept. 27, 2018 | JR000387 - 389 | | X | Rule 403; Hearsay. |
| P-81 | Withdrawn | | | | |
| P-82 | Lux Catering & Events Invoice | MLE 0141 - 45 | | X | None. |
| P-83 | Hagan email to Concilla, Federico and Mueller re BonusGrowth 5 Year Fund PPM Feb. 19, 2014 | MUELLER-CPM 000035 | X | | None |
| P-84 | Concilla email Mueller and Federico re 5 year debenture docs Feb. 20, 2014 | MUELLER-CPM 000063 - 88 | X | | None |

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| P-85 | Concilla email to Mueller, Federico, Smith re Reg D and unqualified funds Mar. 18, 2014 | MUELLER-CPM 000177 - 79 | X | | None |
| P-86 | Concilla email to Mueller re the 575 Jan. 15, 2015 | MUELLER-CPM 001402 | X | | None |
| P-87 | Mueller email to Concilla and Federico re GRD/575 Internal Fund hypotheticals Jan. 20, 2015 | MUELLER-CPM 001405 | | X | None. |
| P-88 | Federico email to Concilla re Catch up Feb. 5, 2015 | MUELLER-CPM 001428 - 76 | X | | None. |
| P-89 | Mueller email to Concilla re deeproot 3 Year Trending Tech Debenture Fund, LLC filings Mar. 27, 2015 | MUELLER-CPM 001545 - 46 | X | | None. |
| P-90 | Mueller email to Concilla and Federico re 3 year tech fund Apr. 2, 2015 | MUELLER-CPM 001547 | X | | None. |
| P-91 | Mueller email to Concilla and Federico re 3 year tech fund Apr. 7, 2015 | MUELLER-CPM 001562 - 63 | X | | None. |
| P-92 | Withdrawn | | | | |
| P-93 | Mueller email to Concilla and Federico re Term Sheet - Draft v1.1 July 23, 2015 | MUELLER-CPM 001706 - 10 | X | | None. |
| P-94 | Mueller email to Concilla re What's a good time today to conference? Aug. 4, 2015 | MUELLER-CPM 001772 - 90 | X | | None. |
| P-95 | Withdrawn | | | | |
| P-96 | Withdrawn | | | | |
| P-97 | Federico email to Mueller and Concilla re Form D Amendment Filing for the dGRD Aug. 9, 2016 | MUELLER-CPM 002351 | X | | None. |
| P-98 | Spradlin Memo May 27, 2020 | MUELLER-CPM 002857 - 58 | | X | None. |
| P-99 | deeproot Investor Presentation Sept. 24, 2015 | MUELLER-CPM 004398 - 432 | X | | None. |
| P-100 | Trifold Draft with Markup Mar. 10, 2023 | MUELLER-CPM 006165 - 69 | | X | None. |

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| P-101 | Mueller Background Questionnaire | SEC_RJM-E-0000001 - 14 | | X | Rule 403. |
| P-102 | Withdrawn | | | | |
| P-103 | Ownership Transfer Agreement | SEC-AAC-E-0000227 - 40 | | X | None. |
| P-104 | Slack Message from Scott Allen | SA-14-15 | | X | None. |
| P-105 | Allen Letter to Mueller Oct. 7, 2020 | SEC-AllenS-E-000081 | X | | None. |
| P-106 | Withdrawn | | | | |
| P-107 | deeproot August Bonus Agreement Sept. 9, 2019 | SEC-AllenS-E-000037 | X | | None. |
| P-108 | Scott Allen Memo May 27, 2020 | SEC-AllenS-E-000046- 51 | X | | None. |
| P-109 | Big Picture Discussion List | SEC-AllenS-E-000009- 14 | X | | None. |
| P-110 | Receipt: Americus Diamond Dec. 14, 2018 | SEC-AMERICUS-E-0000005 | X | | None. |
| P-111 | Receipt: Americus Diamond Dec. 15, 2018 | SEC-AMERICUS-E-0000012 | X | | None. |
| P-112 | Cooper email to deeproot re August 22, 2020 Letter Sept. 4, 2020 | SEC-DEEPROOT-E-0004997 - 99 | | X | None. |
| P-113 | Muller letter to 575P Investors Sept. 30, 2020 | SEC-DEEPROOT-E-0008354 | X | | None. |
| P-114 | Quick FAQ | SEC-DEEPROOT-E-0011222 | X | | None. |
| P-115 | deeproot email re deeproot Pinball Launch Date & Incentive Aug. 27, 2020 | SEC-DEEPROOT-E-0013075 - 77 | X | | None. |
| P-116 | Portfolio Narrative Cover email Mar. 5, 2020 | SEC-DEEPROOT-E-0013221 | X | | None. |
| P-117 | deeproot Family of Companies Investment Portfolio Narrative 2020.B2 | SEC-DEEPROOT-E-0013223 - 36 | X | | None. |
| P-118 | Gibbs Disclosure Dec. 1, 2015 | SEC-DEEPROOT-E-0016060 | | X | None. |
| P-119 | Mueller letter to Kirkman July 9, 2019 | SEC-DEEPROOT-E-0017557 | | X | None. |
| P-120 | Mueller email to Dandridge re deeproot Funds November Updates Nov. 10, 2020 | SEC-DEEPROOT-E-0025419 | X | | None. |

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| P-121 | Fact Right Report, 575 Fund October 15, 2019 | SEC-DEEPROOT-E-0031095 - 121 | | X | Best Evidence is FR1001-1003 |
| P-122 | Cary Mueller email to Mueller re proxy Feb. 2, 2017 | SEC-DEEPROOT-E-0037279 - 82 | X | | None. |
| P-123 | the 575 Allocation Acknowledgement | SEC-DEEPROOT-E-0061786 - 87 | X | | None. |
| P-124 | 575 Fund Client Letter Sept. 30, 2020 | SEC-DEEPROOT-E-0008354 | X | | None. |
| P-125 | Mueller email to Andrew re Policies Apr. 2, 2019 | SEC-DEEPROOT-E-0088710 - 11 | X | | None. |
| P-126 | Presentations and Materials Dec. 29, 2020 | SEC-DEEPROOT-E-0093397 - 99 | X | | None. |
| P-127 | Premier Global Corp. Factoring Service Agreement | SEC-DEEPROOT-E-0186463-71 | | X | Rule 403. |
| P-128 | Withdrawn | | | | |
| P-129 | Withdrawn | | | | |
| P-130 | Withdrawn | | | | |
| P-131 | Wik email to Mueller re Updated Files Mar. 20, 2017 | SEC-DEEPROOT-E-0210796 - 808 | X | | None. |
| P-132 | Mueller email to Turner including Presentations and Brochures Apr. 6, 2016 | SEC-DEEPROOT-E-0211326 - 52 | | X | None. |
| P-133 | Mueller email to Wik re Updated Files Mar. 18, 2017 | SEC-DEEPROOT-E-0226591 - 93 | | X | None. |
| P-134 | Withdrawn | | | | |
| P-135 | Withdrawn | | | | |
| P-136 | Mueller email to Regan and Andrew re Updated Presentations June 8, 2017 | SEC-DEEPROOT-E-0226740 - 82 | X | | None. |
| P-137 | Allen email to Mueller re Deeproot Fund 575P Investment of \$133,000 by Andrew W. Cheronos Oct. 6, 2020 | SEC-DEEPROOT-E-0126910-13 | | X | None. |
| P-138 | Disney Payment History | SEC-DISNEY-E-0000177 - 79 | X | | None. |
| P-139 | Disney Cruise Receipts 2016 | SEC-DISNEY-E-0000001 - 27 | X | | None. |
| P-140 | Disney Cruise Receipts 2017 | SEC-DISNEY-E- | X | | None. |

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| | | 0000051 - 117 | | | |
| P-141 | Disney Cruise Receipts 2018 | SEC-DISNEY-E-0000118 - 173 | X | | None. |
| P-142 | Withdrawn | | | | |
| P-143 | Withdrawn | | | | |
| P-144 | Withdrawn | | | | |
| P-145 | Withdrawn | | | | |
| P-146 | Withdrawn | | | | |
| P-147 | Withdrawn | | | | |
| P-148 | Sub-Sublease Agreement Mar. 2019 | SEC-EMAILS-E-0011648 - 56 | | X | None. |
| P-149 | Tabora Gallery Receipt Jan. 12, 2017 | SEC-EMAILS-E-0016479 | X | | None. |
| P-150 | Tabora Gallery Invoice and Receipts Jan. 12, 2017 | SEC-EMAILS-E-0016515 - 16 | X | | None. |
| P-151 | Tabora Gallery Receipt Aug. 9, 2018 | SEC-EMAILS-E-0016501 - 03 | X | | None. |
| P-152 | Photo from Tabora Gallery | SEC-EMAILS-E-0016473 | X | | None. |
| P-153 | SDV October 2020 Statement | SEC-EMAILS-E-0017226 | | X | None. |
| P-154 | SDV March 2021 Statement | SEC-EMAILS-E-0017232 - 33 | | X | None. |
| P-155 | SDV Lease | SEC-EMAILS-E-0017234 - 67 | | X | None. |
| P-156 | Allen Resume | SEC-EMAILS-E-0018789 | | X | None. |
| P-157 | deeproot Pinball Balance Sheet Dec. 31, 2015 | SEC-FTI-E-0000010 | | X | None. |
| P-158 | deeproot Pinball Balance Sheet Dec. 31 2016 | SEC-FTI-E-0000011 | | X | None. |
| P-159 | deeproot Pinball Balance Sheet Dec. 31, 2017 | SEC-FTI-E-0000012 | | X | None. |
| P-160 | deeproot Pinball Balance Sheet Dec. 31, 2018 | SEC-FTI-E-0000013 | | X | None. |
| P-161 | deeproot Pinball Balance Sheet Dec. 31, 2019 | SEC-FTI-E-0000014 | | X | None. |

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| P-162 | deeproot Pinball Balance Sheet Dec. 31 2020 | SEC-FTI-E-0000015 | | X | None. |
| P-163 | deeproot Pinball Balance Sheet Oct 14, 2021 | SEC-FTI-E-0000016 | | X | None. |
| P-164 | deeproot Pinball General Ledger Sept. 24 - Oct. 14, 2021 | SEC-FTI-E-0000017 - 20 | | X | None. |
| P-165 | deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2016 | SEC-FTI-E-0000021 | | X | None. |
| P-166 | deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2017 | SEC-FTI-E-0000022 | | X | None. |
| P-167 | deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2018 | SEC-FTI-E-0000023 | | X | None. |
| P-168 | deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2019 | SEC-FTI-E-0000024 | | X | None. |
| P-169 | deeproot Pinball Profit Loss Jan. 1 - Dec. 31, 2020 | SEC-FTI-E-0000025 | | X | None. |
| P-170 | deeproot Pinball Profit Loss Jan. 1 - Oct. 14, 2021 | SEC-FTI-E-0000026 | | X | None. |
| P-171 | deeproot Pinball Profit Loss Sept. 24 - Dec. 31, 2015 | SEC-FTI-E-0000027 | | X | None. |
| P-172 | deeproot Pinball Trial Balance Dec. 31, 2016 | SEC-FTI-E-0000028 | | X | None. |
| P-173 | deeproot Pinball Trial Balance Dec. 31, 2017 | SEC-FTI-E-0000029 | | X | None. |
| P-174 | deeproot Pinball Trial Balance Dec. 31, 2018 | SEC-FTI-E-0000030 | | X | None. |
| P-175 | deeproot Pinball Trial Balance Dec. 31, 2019 | SEC-FTI-E-0000031 | | X | None. |
| P-176 | deeproot Pinball Trial Balance Dec. 31, 2020 | SEC-FTI-E-0000032 | | X | None. |
| P-177 | deeproot Pinball Trial Balance Oct. 14, 2021 | SEC-FTI-E-0000033 | | X | None. |
| P-178 | deeproot Pinball Trial Balance Sept. 24 - Dec. 31, 2015 | SEC-FTI-E-0000034 | | X | None. |
| P-179 | deeproot Funds Balance Sheet Dec. 31, 2018 | SEC-FTI-E-0000052 - 55 | | X | None. |
| P-180 | deeproot Funds Balance Sheet Dec. 31, 2015 | SEC-FTI-E-0000044 - 45 | | X | None. |
| P-181 | deeproot Funds Balance Sheet Dec. 31, 2016 | SEC-FTI-E-0000046 - 48 | | X | None. |
| P-182 | deeproot Funds Balance Sheet Dec. 31, 2017 | SEC-FTI-E-0000049 - 51 | | X | None. |

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| P-183 | deeproot Funds Balance Sheet Dec. 31, 2019 | SEC-FTI-E-0000056 - 61 | | X | None. |
| P-184 | deeproot Funds Balance Sheet Dec. 31, 2020 | SEC-FTI-E-0000062 - 67 | | X | None. |
| P-185 | deeproot Funds Balance Sheet Oct. 14, 2021 | SEC-FTI-E-0000068 - 73 | | X | None. |
| P-186 | deeproot Funds Balance Sheet Oct. 14, 2021 | SEC-FTI-E-0000074 - 182 | | X | None. |
| P-187 | deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2016 | SEC-FTI-E-0000183 | | X | None. |
| P-188 | deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2017 | SEC-FTI-E-0000184 | | X | None. |
| P-189 | deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2018 | SEC-FTI-E-0000185 | | X | None. |
| P-190 | deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2019 | SEC-FTI-E-0000186 | | X | None. |
| P-191 | deeproot Funds Profit Loss Jan. 1 - Dec. 31, 2020 | SEC-FTI-E-0000187 | | X | None. |
| P-192 | deeproot Funds Profit Loss Jan. 1 2021 - Oct. 14, 2021 | SEC-FTI-E-0000188 | | X | None. |
| P-193 | deeproot Funds Profit Loss Sept. 24 2015 - Oct. 14, 2021 | SEC-FTI-E-0000189 | | X | None. |
| P-194 | deeproot Funds Trial Balance Dec. 31, 2015 | SEC-FTI-E-0000190 | | X | None. |
| P-195 | deeproot Funds Trial Balance Dec. 31, 2016 | SEC-FTI-E-0000191 - 92 | | X | None. |
| P-196 | deeproot Funds Trial Balance Dec. 31, 2017 | SEC-FTI-E-0000193 - 95 | | X | None. |
| P-197 | deeproot Funds Trial Balance Dec. 31, 2018 | SEC-FTI-E-0000196 - 99 | | X | None. |
| P-198 | deeproot Funds Trial Balance Dec. 31, 2019 | SEC-FTI-E-0000200 - 05 | | X | None. |
| P-199 | deeproot Funds Trial Balance Dec. 31, 2020 | SEC-FTI-E-0000206 - 11 | | X | None. |
| P-200 | deeproot Funds Trial Balance Oct. 14, 2021 | SEC-FTI-E-0000212 - 17 | | X | None. |
| P-201 | deeproot Studios Balance Sheet Dec. 31 2015 | SEC-FTI-E-0000218 | | X | None. |
| P-202 | deeproot Studios Balance Sheet Dec. 31, 2016 | SEC-FTI-E-0000219 | | X | None. |
| P-203 | deeproot Studios Balance Sheet Dec. 31, 2017 | SEC-FTI-E-0000220 | | X | None. |
| P-204 | deeproot Studios Balance Sheet Dec. 31, 2018 | SEC-FTI-E-0000221 | | X | None. |

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| P-205 | deeproot Studios Balance Sheet Dec. 31, 2019 | SEC-FTI-E-0000222 | | X | None. |
| P-206 | deeproot Studios Balance Sheet Dec. 31, 2020 | SEC-FTI-E-0000223 | | X | None. |
| P-207 | deeproot Studios Balance Sheet Oct. 14, 2021 | SEC-FTI-E-0000224 | | X | None. |
| P-208 | deeproot Studios General Ledger Sept. 24 2015 - Oct. 14, 2021 | SEC-FTI-E-0000225 - 34 | | X | None. |
| P-209 | deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2016 | SEC-FTI-E-0000235 | | X | None. |
| P-210 | deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2017 | SEC-FTI-E-0000236 | | X | None. |
| P-211 | deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2018 | SEC-FTI-E-0000237 | | X | None. |
| P-212 | deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2019 | SEC-FTI-E-0000238 | | X | None. |
| P-213 | deeproot Studios Profit Loss Jan. 1 - Dec. 31, 2020 | SEC-FTI-E-0000239 | | X | None. |
| P-214 | deeproot Studios Profit Loss Jan. 1 - Oct. 14, 2021 | SEC-FTI-E-0000240 | | X | None. |
| P-215 | deeproot Studios Profit Loss Sept. 24 2015 - Oct. 14, 2021 | SEC-FTI-E-0000241 | | X | None. |
| P-216 | deeproot Studios Trial Balance Dec. 31, 2016. | SEC-FTI-E-0000242 | | X | None. |
| P-217 | deeproot Studios Trial Balance Dec. 31 2017 | SEC-FTI-E-0000243 | | X | None. |
| P-218 | deeproot Studios Trial Balance Dec. 31, 2018 | SEC-FTI-E-0000244 | | X | None. |
| P-219 | deeproot Studios Trial Balance Dec. 31, 2019 | SEC-FTI-E-0000245 | | X | None. |
| P-220 | deeproot Studios Trial Balance Dec. 31, 2020 | SEC-FTI-E-0000246 | | X | None. |
| P-221 | deeproot Studios Trial Balance Oct. 14, 2021 | SEC-FTI-E-0000247 | | X | None. |
| P-222 | deeproot Studios Trial Balance Sept. 24, 2015 - Dec. 31, 2015 | SEC-FTI-E-0000248 | | X | None. |
| P-223 | Deeproot Tech Balance Sheet Dec. 31, 2015 | SEC-FTI-E-0000249 | | X | None. |
| P-224 | Deeproot Tech Balance Sheet Dec. 31, 2016 | SEC-FTI-E-0000250 | | X | None. |
| P-225 | Deeproot Tech Balance Sheet Dec. 31, 2017 | SEC-FTI-E-0000251 | | X | None. |

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|-----------------------|--|-------------------------|-------------------|------------------|-------------------------------|
| P-226 | Deeproot Tech Balance Sheet Dec. 31, 2018 | SEC-FTI-E-0000252 | | X | None. |
| P-227 | Deeproot Tech Balance Sheet Dec. 31, 2019 | SEC-FTI-E-0000253 | | X | None. |
| P-228 | Deeproot Tech Balance Sheet Dec. 31, 2020 | SEC-FTI-E-0000254 | | X | None. |
| P-229 | Deeproot Tech Balance Sheet Oct. 14, 2021 | SEC-FTI-E-0000255 | | X | None. |
| P-230 | deeproot Tech LLC - General Ledger Sept 24, 2015 – Oct. 14, 2021 | SEC-FTI-E-0000256 - 362 | | X | None. |
| P-231 | Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2016 | SEC-FTI-E-0000363 | | X | None. |
| P-232 | Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2017 | SEC-FTI-E-0000364 | | X | None. |
| P-233 | Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2018 | SEC-FTI-E-0000365 | | X | None. |
| P-234 | Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2019 | SEC-FTI-E-0000366 | | X | None. |
| P-235 | Deeproot Tech Profit Loss Jan. 1 - Dec. 31, 2020 | SEC-FTI-E-0000367 | | X | None. |
| P-236 | Deeproot Tech Profit Loss Jan. 1 - Oct. 14, 2021 | SEC-FTI-E-0000368 | | X | None. |
| P-237 | Deeproot Tech Profit Loss Sept. 24 - Dec. 31, 2015 | SEC-FTI-E-0000369 | | X | None. |
| P-238 | Deeproot Tech Trial Balance Dec. 31, 2016 | SEC-FTI-E-0000370 | | X | None. |
| P-239 | deeproot Tech Trial Balance Dec. 31, 2017 | SEC-FTI-E-0000371 | | X | None. |
| P-240 | deeproot Tech Trial Balance Dec. 31, 2018 | SEC-FTI-E-0000372 | | X | None. |
| P-241 | deeproot Tech Trial Balance Dec. 31, 2019 | SEC-FTI-E-0000373 | | X | None. |
| P-242 | deeproot Tech Trial Balance Dec. 31, 2020 | SEC-FTI-E-0000374 | | X | None. |
| P-243 | deeproot Tech Trial Balance Oct. 14, 2021 | SEC-FTI-E-0000375 | | X | None. |
| P-244 | Policy Services Balance Sheet Dec. 31, 2015 | SEC-FTI-E-0000385 - 90 | | X | None. |
| P-245 | Policy Services Balance Sheet Dec. 31, 2016 | SEC-FTI-E-0000391 - 96 | | X | None. |
| P-246 | Policy Services Balance Sheet Dec. 31, 2017 | SEC-FTI-E-0000397 - 401 | | X | None. |

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|-----------------------|---|--------------------------|-------------------|------------------|-------------------------------|
| P-247 | Policy Services Balance Sheet Dec. 31, 2018 | SEC-FTI-E-0000402 - 06 | | X | None. |
| P-248 | Policy Services Balance Sheet Dec. 31, 2019 | SEC-FTI-E-0000407 - 11 | | X | None. |
| P-249 | Policy Services Balance Sheet Dec. 31, 2020 | SEC-FTI-E-0000412 - 16 | | X | None. |
| P-250 | Policy Services Balance Sheet Oct. 14, 2021 | SEC-FTI-E-0000417 - 21 | | X | None. |
| P-251 | Policy Services General Ledger Sept. 24, 2015 - Oct. 14, 2021 | SEC-FTI-E-0000422 - 535 | | X | None. |
| P-252 | Policy Services Profit Loss Jan. 1 - Dec. 31, 2016 | SEC-FTI-E-0000536 - 37 | | X | None. |
| P-253 | Policy Services Profit Loss Jan. 1 - Dec. 31, 2017 | SEC-FTI-E-0000538 - 39 | | X | None. |
| P-254 | Policy Services Profit Loss Jan. 1 - Dec. 31, 2018 | SEC-FTI-E-0000540 - 41 | | X | None. |
| P-255 | Policy Services Profit Loss Jan. 1 - Dec. 31, 2019 | SEC-FTI-E-0000542 | | X | None. |
| P-256 | Policy Services Profit Loss Jan. 1 - Dec. 31, 2020 | SEC-FTI-E-0000543 | | X | None. |
| P-257 | Policy Services Profit Loss Jan. 1 - Oct. 14, 2021 | SEC-FTI-E-0000544 | | X | None. |
| P-258 | Policy Services Profit Loss Sept. 24 2015 - Dec. 31, 2015 | SEC-FTI-E-0000545 | | X | None. |
| P-259 | Policy Services Trial Balance Dec. 31, 2016 | SEC-FTI-E-0000546 - 50 | | X | None. |
| P-260 | Policy Services Trial Balance Dec. 31, 2017 | SEC-FTI-E-0000551 - 55 | | X | None. |
| P-261 | Policy Services Trial Balance Dec. 31, 2018 | SEC-FTI-E-0000556 - 60 | | X | None. |
| P-262 | Policy Services Trial Balance Dec. 31, 2019 | SEC-FTI-E-0000561 - 65 | | X | None. |
| P-263 | Policy Services Trial Balance Dec. 31, 2020 | SEC-FTI-E-0000566 - 70 | | X | None. |
| P-264 | Policy Services Trial Balance Jan. 1 - Oct. 14, 2021 | SEC-FTI-E-0000571 - 74 | | X | None. |
| P-265 | Policy Services Trial Balance Sept. 14 - Dec. 31, 2015 | SEC-FTI-E-0000575 - 78 | | X | None. |
| P-266 | Kauai Vacation Rental Declaration | SEC-KVRRE-E-0000013 | | X | None. |
| P-267 | Kauai Vacation Rental Owner Statement June 30, 2017 | SEC-KVRRE-E-0000014 - 15 | X | | None. |

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|----------------|--|--------------------------------|------------|-----------|------------------------|
| P-268 | Mueller Wire Receipt re 4330 Kauai Beach Dr. Nov. 14, 2016 | SEC-ORTC-E-0000361 - 62 | | X | None. |
| P-269 | Mueller Wire Receipt re 4330 Kauai Beach Dr. Nov. 15, 2016 | SEC-ORTC-E-0000363 - 64 | X | | None. |
| P-270 | Mueller Wire Receipt re 4330 Kauai Beach Dr. Nov. 2, 2016 | SEC-ORTC-E-0000365 - 66 | | X | None. |
| P-271 | Final Settlement Statement Nov. 28, 2016 | SEC-ORTC-E-0000410 | X | | None. |
| P-272 | Concilla email to Mueller attaching engagement letter Apr. 22, 2013 | SEC-PulmanR-E-0000001 - 3 | X | | None. |
| P-273 | Concilla email to Mueller re Followup to Conference Call Apr. 22, 2013 | SEC-PulmanR-E-0000013 - 17 | X | | None. |
| P-274 | Life Settlement Certificates | SEC-PulmanR-E-0000245 - 1038 | | X | None. |
| P-275 | Life Settlement Certificate, TX120034, Aug 9, 2012 | SEC-PulmanR-E-0000819 - 22 | X | | None. |
| P-276 | Life Settlement Certificate, CA120009, Oct. 1, 2014 | SEC-PulmanR-E-0000868 - 77 | X | | None. |
| P-277 | AMEX Cancellation Letter to Mueller June 2, 2019 | SEC-RFPA-AMEX-E-0001731 | X | | Rule 403. |
| P-278 | x32003 AMEX Statement July 16, 2019 | SEC-RFPA-AMEX-E-0002620 - 27 | X | | Rule 403. |
| P-279 | x41003 AMEX Statement July 19, 2019 | SEC-RFPA-AMEX-E-0002067 - 69 | X | | Rule 403. |
| P-280 | x51001 AMEX Statement July 9, 2017 | SEC-RFPA-AMEX-E-0003373 - 75 | X | | None. |
| P-281 | Amex Statement x51001 May 9, 2016 | SEC-RFPA-AMEX-E-0002851 - 57 | X | | None. |
| P-282 | Amex Statement x51001 Aug. 9, 2016 | SEC-RFPA-AMEX-E-0002927 - 49 | X | | None. |
| P-283 | Amex Statement x51001 Mar. 9, 2017 | SEC-RFPA-AMEX-E-0003067 - 79 | X | | None. |
| P-284 | Amex Statement x51001 Apr. 17, 2017 | SEC-RFPA-AMEX-E-0003081 - 89 | X | | None. |
| P-285 | Amex Statement x51001 July 9, 2018 | SEC-RFPA-AMEX-E-0003255 - 62 | X | | None. |
| P-286 | Amex Statement x51001 Apr. 8, 2019 | SEC-RFPA-AMEX-E-0003351 - 59 | X | | None. |
| P-287 | x51001 Amex Statements | SEC-RFPA-AMEX-E-0002631 - 3375 | | X | None. |
| P-288 | x51001 Amex Payments | SEC-RFPA-AMEX-E-0001618 - 19 | | X | None. |

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|----------------|--|------------------------------------|------------|-----------|------------------------|
| P-289 | Amex Statement x51001 Mar. 9, 2016 | SEC-RFPA-AMEX-E-0002809 - 29 | X | | None. |
| P-290 | x2385 Wells Fargo Wire Full Transaction Report Aug. 14, 2019 | SEC-RFPA-WFB-E-0005707 | X | | None. |
| P-291 | x2385 Wells Fargo Wire Full Transaction Report Oct. 2, 2019 | SEC-RFPA-WFB-E-0005736 | X | | None. |
| P-292 | x2385 Wells Fargo Statements May to July 2020 | SEC-RFPA-WFP-E-0003761 - 4046 | | X | None. |
| P-293 | x2385 Wells Fargo Statements May 2020 to Feb. 2021 | SEC-RFPA-WFP-E-0004610 - 35 | | X | None. |
| P-294 | x2385 Wells Fargo Statements June to Aug. 2021 | SEC-DEEPROOT-E-0231718 – 24, 30-34 | | X | None. |
| P-295 | x2385 Wells Fargo Deposits May 2015 to July 2020 | SEC-RFPA-WFP-E-0003616 - 745 | | X | None. |
| P-296 | x2385 Wells Fargo Deposits July 2020 to Feb. 2021 | SEC-RFPA-WFB-E-0004559 - 69 | | X | None. |
| P-297 | x2385 Wells Fargo Wires Jan. 2014 to May 7, 2021 | SEC-RFPA-WFB-E-0005387 - 914 | | X | None. |
| P-298 | x2534 Wells Fargo Muller Withdrawal Slip for \$100k Aug. 10, 2017 | SEC-RFPA-WFB-E-0003535 | X | | Rule 403. |
| P-299 | x2534 Wells Fargo deeproot Funds Check 2356 to Kauai Vacation Rentals Mar. 3, 2017 | SEC-RFPA-WFB-E-0003542 | X | | None. |
| P-300 | x2534 Wells Fargo Statements Apr. 15, 2015 to July 13, 2020 | SEC-RFPA-WFB-E-0004047 - 275 | | X | None. |
| P-301 | x2534 Wells Fargo Statements July 13, 2020 to Mar. 11, 2021 | SEC-RFPA-WFB-E-0005226 - 261 | | X | None. |
| P-302 | x2534 Wells Fargo Statements May 2021 to Aug. 2021 | SEC-CORR-E-0000318 - 297 | | X | None. |
| P-303 | x2534 Wells Fargo Check Nov. 2020 | SEC-RFPA-WFB-E-0005184 | | X | None. |
| P-304 | x2534 Wells Fargo Deposits May 2015 to July 2020 | SEC-RFPA-WFB-E-0003746 - 49 | | X | None. |
| P-305 | x2534 Wells Fargo Checks/Debits May 2015 to July 2020 | SEC-RFPA-WFB-E-0003495 - 615 | | X | None. |
| P-306 | x2534 Wells Fargo Wire May 19, 2014 | SEC-RFPA-WFB-E-0005915 | | X | None. |

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|----------------|---|---|------------|-----------|------------------------|
| P-307 | x2385 and x2534 Wells Fargo Signature Cards | SEC-RFPA-WFB-E-0003754 - 60 | | X | None. |
| P-308 | x3081 Wells Fargo Wires | SEC-RFPA-WFB-E-0005916 - 19 | | X | None. |
| P-309 | x3081 x3099 Wells Fargo Signature Card | SEC-RFPA-WFB-E-0001944 - 1948 | | X | None. |
| P-310 | x3081 Wells Fargo Statements May 2015 to July 2020 | SEC-RFPA-WFB-E-0002175 - 2405 | | X | None. |
| P-311 | x3081 Wells Fargo Statements May 2021 to Aug. 2021 | SEC-CORR-E-0000212 -15, 326-29, 205 - 08 | | X | None. |
| P-312 | x3081 Wells Fargo Statements July 2020 to Jan. 2021 | SEC-RFPA-WFB-E-0004636 - 65 | | X | None. |
| P-313 | x3081 Wells Fargo Deposits July 2020 to Feb. 2021 | SEC-RFPA-WFB-E-0004570 - 75 | | X | None. |
| P-314 | x3099 Wells Fargo Statements May 2021 to Aug. 2021 | SEC-CORR-E-0000334 - 354 | | X | None. |
| P-315 | x5571 Wells Fargo Sig Card | SEC-RFPA-WFB-E-0004580 - 83 | | X | None. |
| P-316 | x5571 Wells Fargo Statements Feb. 2019 to Feb. 2021 | SEC-RFPA-WFB-E-0005262 - 5365 | | X | None. |
| P-317 | x5571 Wells Fargo Statements May 2015 to Feb. 2021 | SEC-RFPA-WFB-E-0004697 - 4951 | | X | None. |
| P-318 | x5571 Wells Fargo Statements May 2021 to Aug. 2021 | SEC-CORR-E-0000270 - 73, 302 - 05, 245 - 249 | | X | None. |
| P-319 | x5571 Wells Fargo Wires | SEC-RFPA-WFB-E-0005173 - 75 | | X | None. |
| P-320 | x5571 Wells Fargo Wires | SEC-RFPA-WFB-E-0005924 - 28 | | X | None. |
| P-321 | x6415 Wells Fargo Signature Card | SEC-RFPA-WFB-E-0005222 - 25 | | X | None. |
| P-322 | x6415 Wells Fargo Statements May 2021 to Aug. 2021 | SEC-DEEPROOT-E-0231746 - 49, 42 - 45, 37 | | X | None. |
| P-323 | x6575 Wells Fargo Sig Card | SEC-RFPA-WFB-E-0001963 - 66 | | X | None. |
| P-324 | x6575 Wells Fargo Statements Mar. 2017 to July 2020 | SEC-RFPA-WFB-E-0002629 - 2807 | | X | None. |
| P-325 | x6575 Wells Fargo Statements May 2021 to Aug. 2021 | SEC-DEEPROOT-E-0231738 - 41, 13 - 17, 25 - 28, 36 | | X | None. |
| P-326 | x6575 Wells Fargo Checks May 2017 to July 2020 | SEC-RFPA-WFB-E-0001536 -650 | | X | None. |

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|----------------|--|--|------------|-----------|------------------------|
| P-327 | x6575 Wells Fargo Checks July 2020 to Feb. 2021 | SEC-RFPA-WFB-E-0004521 - 30 | | X | None. |
| P-328 | x6575 Wells Fargo Deposits Mar. 2017 to July 2020 | SEC-RFPA-WFB-E-0001847 - 60 | | X | None. |
| P-329 | x6575 Wells Fargo Wires | SEC-RFPA-WFB-E-0005929 - 5960 | | X | None. |
| P-330 | x8461 x8487 Wells Fargo Signature Card | SEC-RFPA-WFB-E-0001938 - 1943 | | X | None. |
| P-331 | x8461 Wells Fargo Statements May 2015 to July 2020 | SEC-RFPA-WFB-E-0002808 - 3094 | | X | None. |
| P-332 | x8461 Wells Fargo Statements May 2021 to Aug. 2021 | SEC-RFPA-WFB-E-0231755 - 59, 50 - 53, 35 | | X | None. |
| P-333 | x8461 Wells Fargo Checks May 2015 to July 2020 | SEC-RFPA-WFB-E-0001651 - 1828 | | X | None. |
| P-334 | x8461 Wells Fargo Checks July 2020 to Feb. 2021 | SEC-RFPA-WFB-E-0004531 - 4558 | | X | None. |
| P-335 | x8461 Wells Fargo Deposits May 2015 to July 2020 | SEC-RFPA-WFB-E-0001861 - 1927 | | X | None. |
| P-336 | x8461 Wells Fargo Wires | SEC-RFPA-WFB-E-0005961 - 64 | | X | None. |
| P-337 | x8487 Wells Fargo Wire Full Transaction Report Nov. 15, 2016 | SEC-RFPA-WFB-E-0006003 | X | | None. |
| P-338 | x8487 Wells Fargo Wire Full Transaction Report Aug. 10, 2018 | SEC-RFPA-WFB-E-0006045 | X | | None. |
| P-339 | x8487 Wells Fargo Statements May 2015 to July 2020 | SEC-RFPA-WFB-E-0003095 - 3270 | | X | None. |
| P-340 | x8487 Wells Fargo Statements July 2020 to Feb. 2021 | SEC-RFPA-WFB-E-0005022 - 37 | | X | None. |
| P-341 | x8487 Wells Fargo Statements May 2021 to Aug. 2021 | SEC-CORR-E-0000209 - 221 | | X | None. |
| P-342 | x8487 Wells Fargo Deposits May 2015 to July 2020 | SEC-RFPA-WFB-E-0001928 - 35 | | X | None. |
| P-343 | x8487 Wells Fargo Wires | SEC-RFPA-WFB-E-0005965 - 6086 | | X | None. |
| P-344 | x5571 Wells Fargo Deposits Feb. 2019 to Feb. 2021 | SEC-RFPA-WFB-E-0005185 - 212 | | X | None. |
| P-345 | Withdrawn | | | | |
| P-346 | Withdrawn | | | | |

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|----------------|---|-----------------------------------|------------|-----------|--|
| P-347 | Withdrawn | | | | |
| P-348 | Withdrawn | | | | |
| P-349 | Withdrawn | | | | |
| P-350 | deeproot Portal - Investors | SEC-SEC-E-0003162 - 3261 | | X | None. |
| P-351 | deeproot Portal - Policies Services - Closed Policies | SEC-SEC-E-0003262 | | X | None. |
| P-352 | deeproot Portal - Policies Services - Open Policies | SEC-SEC-E-0003265 | | X | None. |
| P-353 | Leon Declaration Sept. 14, 2022 | SEC-SEC-E-0002496 | | X | Hearsay; conclusory; lack of foundation; assumes facts not in evidence; Rule 702; improper legal conclusion; Rule 403. |
| P-354 | Gray Declaration Oct. 9, 2022 | SEC-SEC-E-0002959 | | X | Hearsay; conclusory; lack of foundation; assumes facts not in evidence; Rule 702; improper legal conclusion; Rule 403. |
| P-355 | Saint Mary's Hall Declaration | SEC-SMH-E-0000111 | | X | None. |
| P-356 | Saint Mary's Hall Transaction Records | SEC-SMH-E-0000026 - 52, 55-57, 59 | X | | None. |
| P-357 | Spradlin Memo to Mueller June 11, 2022 | SEC-SpradlinN-E-0000123 | X | | None. |
| P-358 | Spradlin Resignation Letter July 9, 2020 | SEC-SpradlinN-E-0000124 | X | | None. |
| P-359 | Spradlin Resume | SPRADLIN0001 - 02 | | X | None. |
| P-360 | x4336 x6407 x7059 USAA Records Feb. 2014 to Feb. 2021 | SEC-USAA-E-0000030 - 1027 | | X | None. |
| P-361 | Amex Statement x51001 Sept. 7, 2018 | SEC-RFPA-AMEX-E-0003273 - 82 | | X | None. |
| P-362 | Amex Statement x51001 Apr. 8, 2016 | SEC-RFPA-AMEX-E-0002831 - 49 | | X | None. |
| P-363 | Robert Mueller Employee Earning Record | SEC-PAYCHEX-E-0000220 - 32 | | X | None. |
| P-364 | Summary: Investments in 575 Fund and dGRD Fund | | X | | None. |

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|----------------|--|-------------|------------|-----------|------------------------|
| P-365 | Summary: Insurance Policies Purchased by Policy Services | | X | | None. |
| P-366 | Summary: Payments to Investors | | X | | Rule 403 |
| P-367 | Summary: Payment of Mueller's Personal Expenses | | X | | Rule 403 |
| P-368 | Summary: Robert Mueller Compensation | | X | | Rule 403 |
| P-369 | Secured Promissory Notes for Basha Policy, Nov. 1, 2018 | | | X | None. |
| P-370 | Policy Relinquishment and Loan Satisfaction Agreement for Basha Policy, Apr. 8, 2019 | | | X | None. |
| P-371 | Factright, 575 Fund Report, Mar. 1, 2018 | | | X | None. |
| P-372 | Factright, dGRD Fund Report, Mar. 1, 2018 | | | X | None. |
| P-373 | Factright, 575 Fund Report, Oct. 25, 2019 | | | X | None. |
| P-374 | Factright, dGRD Fund Report, Oct. 25, 2019 | | | X | None. |
| P-375 | Amended Answer, Dkt. No. 75 | | | X | Hearsay |
| P-376 | Gray Ownership Certificates | | X | | None. |
| P-377 | Gray Welcome Letter | | X | | None. |
| P-378 | Gray Subscription Agreement and other documents | | X | | None. |
| P-379 | Jennings dGRD Application, May 4, 2016 | | X | | None. |
| P-380 | Jennings 575 Application and Subscription Agreement, June 2, 2016 | | X | | None. |
| P-381 | B. Jennings 575 Certificate of Ownership, June 2, 2016 | | X | | None. |
| P-382 | B. Jennings Welcome Letter, June 6, 2016 | | X | | None. |
| P-383 | B. Jennings 575 Application and Subscription Agreement, June 13, 2017 | | X | | None. |
| P-384 | B. Jennings 575 Certificate of Ownership, June 13, 2017 | | X | | None. |

| P's Ex. Number | Description | Bates Label | Will Offer | May Offer | Defendant's Objections |
|----------------|---|-------------|------------|-----------|------------------------|
| P-385 | B. Jennings Welcome Letter, June 14, 2017 | | X | | None. |
| P-386 | B. Jennings email re: 575p Payment for Sept., Sept. 28, 2020 | | X | | None. |
| P-387 | McClain Application and Subscription Agreement, Oct. 20, 2016 | | X | | None. |
| P-388 | McClain Certificate of Ownership, Dec. 20, 2016 | | X | | None. |
| P-389 | McClain Welcome Letter, Dec. 20, 2016 | | X | | None. |

Dated: May 3, 2024

Respectfully submitted,

DAVIS & SANTOS, PLLC

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Counsel for Defendant Robert J. Mueller

CERTIFICATE OF SERVICE

I certify that on May 3, 2024, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and all counsel of record will receive an electronic copy via the Court's CM/ECF system.

/s/ Caroline Newman Small

Caroline Newman Small